

ORIGINAL

AUSA Cynthia Oberg 313-226-9701

WI ⑥

AO 91 (Rev. 11/11) Criminal Complaint

USPI Carla Menendez (313) 226-8235

UNITED STATES DISTRICT COURT

for the
Eastern Michigan

United States of America

v.

D-1 Curtis Del Jr-Robinson
D-2 Tamisha Kenner
D-3 Robert Gardner
D-4 Maurice Webb
D-5 Tiara Montgomery

Case:2:13-mj-30510

Judge: Unassigned,

Filed: 08-22-2013 At 10:11 AM

USA v. CURTIS DEL JR-ROBINSON et al
(CMP)(MLW)*Defendant(s)*

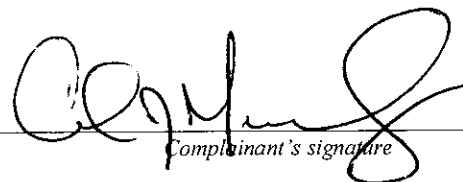
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2011 through January 2013 in the county of Wayne, Macomb and Oakland in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*Title 18, United States Code, Section 1028
Title 18, United States Code, Section 1029(a)(1)
Title 18, United States Code, Section 1344
Title 18, United States Code, Section 371*Offense Description*Fraud and related activity in connection with identification documents
Fraud and Related Activity in Connection with Access Devices
Bank Fraud
Conspiracy to commit offense or to defraud United States

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Carla J. Menendez, United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: August 22, 2013*Judge's signature*City and state: Detroit, Michigan

Hon. R. Steven Whalen, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Carla J. Menendez, after being duly sworn, do state the following:

1. I am a United States Postal Inspector and have been employed as such for approximately eight years. As a United States Postal Inspector, my responsibilities include investigations involving mail theft, identity theft, access device fraud, and other related crimes affecting the United States Postal Service. I am familiar with the information contained in this affidavit based on personal investigation and on information provided by other law enforcement officers. The information outlined below is provided for the limited purpose of establishing probable cause, and does not contain all details or all facts that exist pertaining to this investigation.

2. In October 2012, Ed Henkel, Global Fraud Investigator for Wal-Mart/Sam's Club, contacted your Affiant regarding what he believed to be a gang operation throughout Metro Detroit, MI affecting Sam's Club memberships. Henkel advised suspects were being fraudulently added as authorized users on existing Sam's Club membership accounts. After being successfully added, the suspects had full use of the Sam's Club membership and its associated GE Money credit card linked to the account. Suspects then traveled to various Sam's Clubs around the metro Detroit, MI area and purchased merchandise totaling \$288,103.94.

3. After further investigation and coordination with GE Money Fraud Investigator Pat Weber, the following was revealed; suspects were added as authorized users to 34 Sam's Club memberships over the telephone. The suspects

called into Sam's Club customer service, possessing the Sam's Club membership number and personal identifiers of the true member (victim). Once the account was verified, the suspects were added as authorized users to the victims' account using their (the suspects') own personal information (date of birth, address, phone number). Once added to the account, the suspects requested an additional Sam's Club Consumer Credit Card (managed by GE Money) in their name to be sent to the address they added to the existing account. These credit cards were sent via US Mail and received at the addresses the suspects added.

4. As the suspects were added to the victims' memberships over the telephone, they needed to obtain a Sam's Club membership card in their name before making any purchases. Therefore, after the credit card was received in the mail, the suspects traveled to various Sam's Club in the Metro Detroit, MI area and went to the customer service counter. The suspects advised they were added to an existing account and needed a membership card. The suspects' information from their Michigan driver's licenses was verified by the clerk, a photo was taken and a membership card was created for the suspects. Possessing both the membership card and associated Sam's Club Consumer Credit Card, the suspects then purchased merchandise, gasoline or gift cards at the various Sam's Club or Wal-Mart stores. Total loss to GE Money was \$288,103.94.

5. Your Affiant identified five suspects whom, between October 2011 and January 2013, are responsible for the \$288,103.94 in fraudulent purchases on the 34 separate victims' GE Money accounts. These suspects are **CURTIS DEL JR-ROBINSON, TAMISHA KENNER, ROBERT GARDNER, MAURICE WEBB and TIARA MONTGOMERY.**

6. Between October 27, 2011 and October 31, 2011, **TIARA MONTGOMERY** was added as an authorized user on one victim's Sam's Club account and used the associated GE Money credit card at Sam's Club and Wal-Mart stores in metro Detroit, MI. The total of actual loss for these purchases was \$14,467.47. Your Affiant compared the in person photo taken for the membership card and Montgomery's Michigan driver's license. Both photos match and the signature on the receipts for purchases also matches the signature on her Michigan driver's license. Therefore, **TIARA MONTGOMERY** was responsible for these purchases. (See spreadsheet for account and purchase details.)

7. Between October 30, 2012 and November 6, 2012, **MAURICE WEBB** was added as an authorized user on two victim's Sam's Club accounts and used the associated GE Money credit cards at Sam's Club and Wal-Mart stores in metro Detroit, MI. The total of actual loss for these purchases was \$27,435.56. Your Affiant compared the in person photo taken for the membership card, Webb's Michigan driver's license and surveillance footage of purchases during this time period. Both photos are matches to the person in the surveillance video and the signature on the receipts for purchases matches the signature on his Michigan driver's license. Therefore, **MAURICE WEBB** was responsible for these purchases. (See spreadsheet for account and purchase details.)

8. Between October 23, 2012 and November 7, 2012, **ROBERT GARDNER** was added as an authorized user on three victim's Sam's Club accounts and used the associated GE Money credit cards at Sam's Club and Wal-Mart stores in metro Detroit, MI. The total of actual loss for these purchases was \$40,664.69. Your Affiant compared the in person photo taken for the membership

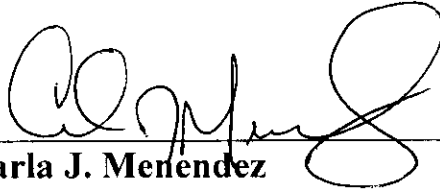
card, Gardner's Michigan driver's license and surveillance footage of purchases during this time period. Both photos are matches to the person in the surveillance video and the signature on the receipts for purchases matches the signature on his Michigan driver's license. Therefore, **ROBERT GARDNER** was responsible for these purchases. (See spreadsheet for account and purchase details.)

9. Between May 11, 2012 and August 18, 2012, **TAMISHA KENNER** was added as an authorized user on four victim's Sam's Club accounts and used the associated GE Money credit cards at Sam's Club and Wal-Mart stores in metro Detroit, MI. The total of actual loss for these purchases was \$62,004.95. Your Affiant compared the in person photo taken for the membership card, Kenner's Michigan driver's license and surveillance footage of purchases during this time period. Both photos are matches to the person in the surveillance video and the signature on the receipts for purchases matches the signature on her Michigan driver's license. As shown in surveillance footage and receipts for purchases during this time period, **TAMISHA KENNER** was responsible for these purchases. (See spreadsheet for account and purchase details.)

10. Between September 29, 2012 and January 14, 2013, **CURTIS DEL JR-ROBINSON** was added as an authorized user on six victim's Sam's Club accounts and used the associated GE Money credit cards at Sam's Club and Wal-Mart stores in metro Detroit, MI. The total of actual loss for these purchases was \$75,645.48. Your Affiant compared the in person photo taken for the membership card, Robinson's Michigan driver's license and surveillance footage of purchases during this time period. Both photos are matches to the person in the surveillance video and the signature on the receipts for purchases matches the signature on his Michigan driver's license. Therefore, **CURTIS DEL JR-ROBINSON** was


responsible for these purchases. (See spreadsheet for account and purchase details.)

11. **ROBINSON, KENNER, GARDNER, WEBB** and **MONTGOMERY** do not have any affiliation with the victims (individuals and businesses) identified in the above paragraphs and were not authorized to use the accounts associated with those victims. Therefore, based on the information contained in this affidavit, Affiant believes that probable cause exists to establish that in the Eastern District of Michigan, **CURTIS DEL JR-ROBINSON, TAMISHA KENNER, ROBERT GARDNER, MAURICE WEBB** and **TIARA MONTGOMERY** did unlawfully and knowingly violate Title 18, United States Code, Sections 1028 (Identity Theft), 1029 (Access Device Fraud), 1344 (Bank Fraud) and 371 (Conspiracy).



Carla J. Menendez
U.S. Postal Inspector

Subscribed and sworn to before me
this 22nd day of August 2013.



Honorable R. Steven Whalen
United States Magistrate/Judge